

EXHIBIT C

From: [Neal Deckant](#)
To: [Hart Robinovitch](#)
Cc: [Ryan Ellersick](#); [Lori G. Feldman](#); [Goldman, Lauren](#); [Katja Lange](#)
Subject: Re: Request for Access to Sealed Materials in In re Meta Pixel Tax Filing Cases, No. 22-cv- 7557-PCP (N.D. Cal.).
Date: Tuesday, November 4, 2025 1:10:25 PM

EXTERNAL EMAIL: Use caution with requests, links, and attachments.

Thanks for the clarification. Our position remains that you will need to seek relief from the Court.

--Neal

On Tue, Nov 4, 2025 at 12:01 PM Hart Robinovitch <Hart.Robinovitch@zimmreed.com> wrote:

Neal – does that position hold even though we are willing to sign onto the Protective Order that was entered by the court In re Meta Pixel Tax Cases and/or to enter into a different protective order that maintains confidentiality? The cases that we cited support a modification to any protective order to allow access to persons with collateral litigation. Let us know, and if helpful to jump on a call to discuss further, we are happy to do that.

Thanks,

Hart

HART ROBINOVITCH | PARTNER

ZIMMERMAN REED LLP
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Minneapolis | Los Angeles | Phoenix

If you received this e-mail in error, please notify the sender immediately and delete.

From: Neal Deckant <ndeckant@bursor.com>
Sent: Tuesday, November 4, 2025 12:41 PM
To: Ryan Ellersick <ryan.ellersick@zimmreed.com>
Cc: Lori G. Feldman <lfeldman@4-justice.com>; Goldman, Lauren <goldman@gibsondunn.com>; Hart Robinovitch <Hart.Robinovitch@zimmreed.com>; Katja Lange <Katja.Lange@zimmreed.com>
Subject: Re: Request for Access to Sealed Materials in In re Meta Pixel Tax Filing Cases, No. 22-cv-7557-PCP (N.D. Cal.).

EXTERNAL EMAIL: Use caution with requests, links, and attachments.

Hi Ryan,

Given the nature of your request (i.e., materials designated Confidential by the PO), you will need to seek relief from the Court.

--Neal

On Tue, Nov 4, 2025 at 9:10 AM Ryan Ellersick <ryan.ellersick@zimmerreed.com> wrote:

Counsel,

Just following up on the below correspondence to see if you have a position on our anticipated motion to intervene.

Best,

Ryan

RYAN ELLERSICK | PARTNER

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If you received this e-mail in error, please notify the sender immediately and delete.

From: Ryan Ellersick <ryan.ellersick@zimmerreed.com>

Sent: Wednesday, October 29, 2025 8:17 PM

To: ndeckant@bursor.com <ndeckant@bursor.com>; Lori G. Feldman <lfeldman@4-justice.com>; lgofldman@gibsondunn.com <lgofldman@gibsondunn.com>

Cc: Hart Robinovitch <Hart.Robinovitch@zimmerreed.com>; Katja Lange <Katja.Lange@zimmerreed.com>

Subject: Request for Access to Sealed Materials in In re Meta Pixel Tax Filing Cases, No. 22-cv-7557-PCP (N.D. Cal.).

Counsel,

Please see the attached correspondence and let us know if you are available to meet and confer about our request.

Best regards,

Ryan

RYAN ELLERSICK | PARTNER

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